

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

**DECLARATION OF MARK S. CHEFFO IN SUPPORT OF DEFENDANTS' MOTION  
TO STRIKE PLAINTIFF'S UNTIMELY EXPERT DISCLOSURES**

I, Mark S. Cheffo, declare and state as follows:

1. I am a partner with the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, counsel for Defendants Pfizer Inc and Warner-Lambert Company LLC. I make this declaration based on my own personal knowledge and information.

2. Attached as Exhibit A is a true and correct copy of Plaintiff's Supplemental Expert Disclosure in *Smith v. Pfizer*, dated April 14, 2010.

3. Attached as Exhibit B is a true and correct copy of Plaintiff's Supplemental Expert Disclosure in *All Products Liability Cases*, dated April 14, 2010.

4. Attached as Exhibit C is a true and correct copy of J. B. Olsen et al., "Antiepileptic drugs and risk of suicide: a nationwide study," *Pharmacoepidemiology and Drug Safety* (2010).

Signed under the penalties of perjury this 16<sup>th</sup> day of April, 2010.

Mark S. Cheffo  
Mark S. Cheffo

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 16<sup>th</sup> day of April 2010, I electronically filed the foregoing document with the Clerk of the Court, United States District Court for the Middle District of Tennessee, using the CM/ECF system. True and correct copies of the foregoing documents are being served via the Court's CM/ECF system on the following:

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*/s/ Gerald D. Neenan*